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*Counsel for Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

Bankruptcy Case  
No. 19-30088 (DM)

**PG&E CORPORATION**

Chapter 11  
(Lead Case)  
(Jointly Administered)

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

**STATUS REPORT REGARDING  
REVISIONS TO (A) THE FIRE PROOF  
OF CLAIM FORM (DKT. NOS. 1824 &  
2605) AND (B) THE AMENDED ORDER  
ON MOTION OF THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
FOR ENTRY OF AN ORDER  
(I) ESTABLISHING A BAR DATE FOR  
FILING FIRE CLAIMS, (II) APPROVING  
THE FORM AND PROCEDURES FOR  
NOTICE OF THE BAR DATE FOR FIRE  
CLAIMS, AND (III) APPROVING  
SUPPLEMENTAL PROCEDURES FOR  
NOTICE OF THE BAR DATE TO FIRE  
CLAIMANTS (DKT. NOS. 2297 & 2605)**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Date: June 26, 2019  
Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 The Official Committee of Tort Claimants (the “TCC”) hereby submits the following Status  
2 Report regarding its efforts to resolve objections to:

- 3 • Motion of the Official Committee of Tort Claimants Pursuant to 11 U.S.C.  
4 §§ 105(a) and 501 and Fed. R. Bankr. P. 3001(a) for Entry of an Order  
5 Approving Proposed Model Proof of Claim Form for Fire Claims and  
6 Related Procedures (Dkt. No. 1824) (the “**Claim Form Motion**”); and
- 7 • Motion of the Official Committee of Tort Claimants Pursuant to 11 U.S.C.  
8 §§ 105(a), 501 and Fed. R. Bankr. P. 3001(a), 3003(c), 5005 and 9007 for  
9 Entry of an Order (I) Establishing a Bar Date for Filing Fire Claims,  
10 (II) Approving the Form and Procedures for Notice of the Bar Date for Fire  
11 Claims, and (III) Approving Supplemental Procedures for Notice of the Bar  
12 Date to Fire Claimants (Dkt. No. 2297) (the “**TCC Bar Date Motion**”).

13 The TCC has revised its proposed Fire Proof of Claim Form to address certain objections  
14 raised by the SLF Claimants (*see* Dkt. Nos. 2248 & 2658) and comments received from the United  
15 States Trustee, and to include updated address information where proofs of claim can be delivered.

16 The proposed revisions include the following:

- 17 • Question 11, and the related Instruction therefor, gives Fire Claimants the  
18 option of providing a claim amount.
- 19 • Question 2 asks Fire Claimants to identify whether their claim has been  
20 acquired from someone else.
- 21 • Question 6 asks Fire Claimants to identify whether they know if anyone else  
22 has filed a proof of claim for them.
- 23 • The Instructions include updated address information where Fire Proof of  
24 Claim Forms can be delivered.

25 The revised Fire Proof of Claim Form also includes Question 3, and the related Instruction  
26 therefor, which gives Fire Claimants the option of filing a claim on behalf of a family. It is the  
27 TCC’s understanding that the SLF Claimants still intend to oppose the adoption of the TCC’s Fire  
28 Proof of Claim Form notwithstanding these modifications.

29 The TCC has also revised the proposed amended form of order for the TCC Bar Date  
30 Motion to address the objection filed by State Farm Mutual Automobile Insurance Company  
31 (“**State Farm**”) (*see* Dkt. No. 2603) and further comments provided by certain California State  
32 Agencies. The proposed revisions include:

- 33 • The definition of the term “Fire Claim” is now set forth in Paragraph 2 of  
34 the Order rather than being incorporated by reference in a footnote.

- The carve-out in Paragraph 7 for claims of any State of California governmental unit contains language clarifying that it includes claims of any city, county, special district or joint authority, or other local governmental unit.
- Paragraph 16 was added to clarify that the Order does not predetermine the propriety of any subpoena to be issued on behalf of the TCC and does not affect any rights of the subpoena's target to oppose, move to quash, or object to it on any available grounds under the Federal Rules of Evidence, Federal Rules of Civil or Bankruptcy Procedure, or other applicable law.

It is the TCC's understanding that these revisions address the objection filed by State Farm and the comments received from the California State Agencies. The TCC has not been able to reach an agreement with the Debtors or the UCC regarding the bar date and related notice procedures.

Attached hereto as **Exhibit A** and **Exhibit B**, respectively, are a revised Fire Proof of Claim Form and a proposed amended order on the TCC Bar Date Motion. Exhibit A and Exhibit B also include redlines reflecting the applicable revisions made since June 19, 2019.

Dated: June 25, 2019

**BAKER & HOSTETLER LLP**

By: /s/ Eric Goodman  
Eric Goodman